

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
ANNAMARIE TROMBETTA,

Plaintiff,

-v-

NORB NOVOCIN, MARIE NOVOCIN, ESTATE
AUCTIONS, INC., AND WORTHPOINT
CORPORATION,

Defendants.

CIVIL ACTION NO.: 18 Civ. 993 (RA) (SLC)

**CASE MANAGEMENT PLAN AND
SCHEDULING ORDER**

SARAH L. CAVE, United States Magistrate Judge:

Pursuant to the discovery conference held today, February 1, 2022, discovery in this case will proceed as follows:

1. A model confidentiality stipulation and protective order is available on the Court's page on the Southern District's website. The parties shall promptly meet and confer concerning a protective order in this action and shall file a proposed protective order for the Court's endorsement by **February 15, 2022**.
2. By **February 15, 2022**, Ms. Trombetta shall serve on Defendants a confidential settlement demand (the "Settlement Demand"). Ms. Trombetta shall not file the Settlement Demand with the Court.
 - a. The parties shall meet and confer after Ms. Trombetta serves the Settlement Demand and shall file a joint letter by **March 4, 2022** stating whether the parties request a settlement conference with the Court.
3. Initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1)(A) shall be served by **February 25, 2022**.
4. All fact discovery shall be completed by **August 1, 2022**.
 - a. Initial requests for documents shall be served by **February 25, 2022**.
 - b. Interrogatories shall be served by **February 25, 2022**.

- c. Responses to the initial requests for documents and interrogatories shall be served by **April 8, 2022**.
- d. Depositions shall be completed by **May 26, 2022**.
 - i. Neither party may take more than ten depositions. Absent an agreement between the parties, non-party depositions shall follow party depositions.
- e. Any subpoenas requesting documents from third parties must be served by no later than **June 13, 2022**.
 - i. The parties should serve subpoenas for third party records as early as practicable, and the Court may decline to extend any deadlines for the completion of discovery predicated on the late production of documents from third parties, especially if the subpoenas were not timely served.
- f. The parties shall file a joint status letter confirming that discovery is complete by **August 8, 2022**.
- 5. All discovery, including expert discovery, shall be completed by **September 23, 2022**.
 - a. Expert reports shall be served by **August 17, 2022**.
 - b. Depositions of experts shall be completed by **September 23, 2022**.
 - c. The parties shall file a joint status report certifying the completion of all discovery by **September 30, 2022**. The parties shall adhere to the individual practices of the Honorable Ronnie Abrams concerning the filing and contents of any motion for summary judgment(s) or pretrial documents, including a proposed joint pretrial order.

The Court will hold a telephone status conference on **Tuesday, April 26, 2022 at 10:00**

am. The Parties are directed to call the Court's conference line at 866-390-1828, access code, 380-9799, at the scheduled time.

The Clerk of Court is respectfully directed to mail a copy of this Order to Ms. Trombetta at the address below.

Dated: New York, New York
February 1, 2022

SO ORDERED.


SARAH L. CAVE
United States Magistrate Judge

Mail To: Annamarie Trombetta
175 East 96th Street, Apt 12R
New York, New York 10128